UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

ContentGuard Holdings, Inc.

Plaintiff,

v.

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

Defendants.

Civil Action No. 2:13-cv-01112-JRG JURY TRIAL DEMANDED

NOTICE OF COMPLIANCE WITH THIRD-PARTY PRODUCTION PROVISIONS BY HTC CORPORATION AND HTC AMERICA, INC.

Pursuant to paragraph 12 of the Amended Protective order, Defendants HTC Corporation and HTC America, Inc. file this notice that it produced third-party confidential information and verifies as follows:

1. Technology Innovations Associates, LLC: HTC notified Technology Innovations
Associates of its intent to produce Technology Innovations Associates' confidential documents
by letter dated September 25, 2014, sent via email and Federal Express. The letter informed
Technology Innovations Associates of the specific items to be produced and included the
Amended Protective Order. Technology Innovations Associates has not contacted HTC to
discuss any objections to the production under the confidentiality designation "Confidential Outside Attorneys' Eyes Only."

- 2. <u>Hybrid Audio, LLC</u>: HTC notified Hybrid Audio of its intent to produce Hybrid Audio's confidential documents by letter dated September 16, 2014, sent via Federal Express. The letter informed Hybrid Audio of the specific items to be produced and included the Amended Protective Order. The package sent to Hybrid Audio via Federal Express was returned due to an outdated address. A second letter was sent to Hybrid Audio on September 24, 2014, via Federal Express, to an address in Cummings, Georgia, after research on the internet. Hybrid Audio has not contacted HTC to discuss any objections to the production under the confidentiality designation "Confidential - Outside Attorneys' Eyes Only."
- 3. PACid Group, LLC ("PACid"): HTC notified PACid of its intent to produce PACid's confidential documents by letter dated September 25, 2014, sent via Federal Express. The letter informed PACid of the specific items to be produced and included the Amended Protective Order. PACid contacted HTC on October 9, 2014, and authorized production of its confidential documents under the confidentiality designation "Confidential - Outside Attorneys" Eyes Only."

DATED: October 10, 2014 Respectfully submitted,

> By: /s/Peter J. Wied Peter J. Wied

LOCAL COUNSEL:

OF COUNSEL:

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on October 10, 2014. *See* Local Rule CV-5(a)(3)(A).

/s/Peter J. Wied

Peter J. Wied